

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	
DAVID GORDON WALLACE, JR.	§	Case No. 15-31594-H4-7
	§	
	§	(Chapter 7)
Debtor	§	

**NOTICE OF APPEARANCE, REQUEST FOR ALL
NOTICES, AND DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Winstead PC ("Winstead") hereby appears on behalf of Thomas L. Taylor, Court Appointed Receiver of Kaleta Capital Management, Inc. (the "Receiver") and submits this notice of appearance in the above-captioned proceeding and requests notice of all hearings and conferences herein and makes a demand for service of all papers herein, including all papers and notices pursuant to Bankruptcy Rules 2002, 3017, 9007 and 9010 and §1109(b) of the Bankruptcy Code.

All notices given or required to be given in this case shall be given to and served upon Winstead at the following address:

Joseph G. Epstein
Sean B. Davis
WINSTEAD PC
1100 JPMorgan Chase Tower
600 Travis Street
Houston, Texas 77002
Telephone: (713) 650-8400
Facsimile: (713) 650-2400
jepstein@winstead.com
sbdavis@winstead.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and section of the Bankruptcy Code

specified above, but also includes, without limitation, the schedules, statement of financial affairs, operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleadings or request, discovery request, deposition notice, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, electronic mail, telephone, telegraph, telex or otherwise filed with or delivered to the Bankruptcy Clerk, Clerk, Court or judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above-referenced bankruptcy case and any proceedings related thereto.

PLEASE TAKE FURTHER NOTICE that the Receiver intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive: (i) the right of the Receiver to object and/or not consent to entry of final orders by a Bankruptcy Judge in non-core matters and request that final orders in non-core matters be entered only after de novo review by a District Judge; (ii) the right of the Receiver to trial by jury in any proceedings so triable in this case or any case, controversy or proceeding related to this case; (iii) the right of the Receiver to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Receiver is or may be entitled under agreements, at law, in equity or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments the undersigned expressly reserves on behalf of the Receiver.

DATED: May 4, 2015.

Respectfully submitted,

WINSTEAD PC
1100 JPMorgan Chase Tower
600 Travis Street
Houston, Texas 77002
(713) 650-8400
(713) 650-2400 (Facsimile)

By: /s/Joseph G. Epstein
Joseph G. Epstein
State Bar No. 06639320
Southern District No. 11733
Sean B. Davis
Texas Bar No. 24069583
S.D. Tex. No. 1048341

**ATTORNEYS FOR THOMAS L. TAYLOR,
COURT APPOINTED RECEIVER OF
KALETA CAPITAL MANAGEMENT, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2015, a true and correct copy of the foregoing Notice of Appearance was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/Joseph G. Epstein
One of Counsel